

EXHIBIT “1”

Doc Req. #	Description	Status	Resolution?
1(a)	Documents identifying insiders of Debtor	Everything responsive they have was produced (operating agreement dated 6/1/12)	Resolved
1(b)	Debtor’s corporate formation documents	Everything responsive they have was produced (Certificate of Organization)	Resolved
1(c)	Debtor’s corporate governance documents	Everything responsive they have was produced (Operating Agreement dated 6/1/12)	Resolved
1(d)	Minutes or other records of meetings	No responsive documents exist	Resolved
1(e)	Documentation of Debtor’s assets	Per Debtor, there are no asset schedules or loan applications. All responsive documents that exist have been produced.	Resolved
1(f)	Documentation of transfers among Debtor, Terra, and Mr. Nash	Everything responsive they have was produced (Spreadsheet prepared by Debtor through 12/31/19, later updated through Petition Date)	Resolved
1(g)	Documentation of non-ordinary course transfers by Debtor	Only transfer was of the sport utility vehicle, and copy of title evidencing transfer believed to have been produced	Resolved To the extent not already provided, Debtor to provide copy of title evidencing transfer
1(h)	Debtor’s bank records	Debtor produced bank statements and copies of checks for a portion of the relevant time period	Resolved To the extent not already provided, Debtor to provide missing bank records

		(missing checks for 1/16 – 5/16 and 9/16 – 1/17)	
1(i)	Documentation of revenue received by Debtor not deposited into bank accounts	Nothing produced; Debtor believes all income was deposited into the identified bank accounts	Resolved
1(j)	Debtor's credit card statements	Debtor only had a credit card from 6/16 to 6/17 and produced those statements	Resolved
1(k)	Documents evidencing payments or transfers by Debtor Mr. Nash or other insiders	Everything responsive they have was produced	Resolved
1(l)	Debtor's purchase orders, contracts, invoices, etc.	Objected to as unduly burdensome- nothing produced	<p>Partially Resolved</p> <p>Debtor to provide a list of all jobs worked in requested time period, including name of counterparty, the time period when work was performed, a brief description of the work, and the amount paid for the job.</p> <p>For all jobs where there was a written agreement, Debtor to provide copy of its agreement with whoever hired it.</p> <p>The parties are at an impasse relative to production of invoices.</p>
1(m)	Debtor's last 4 tax returns	Debtor doesn't file its own returns. Mr. Nash files Schedule C on his personal returns. 2019 has not been filed yet. 2016-2018 Schedule Cs were produced.	<p>Resolved</p> <p>Debtor to provide copy of 2019 Schedule C when filed</p>
1(n)	Debtor's financial statements	No responsive documents exist	Resolved
1(o)	Debtor's payroll records or other documents identifying Debtor's employees	Everything responsive they have was produced	Resolved

1(p)	Debtor's subcontractors	Objected to as unduly burdensome- nothing produced	Partially Resolved Debtor to provide a list of all subcontractors used during requested time period. Debtor reviewing records as to whether contracts or other documentation with subcontractors exists; if it does exist, parties are at an impasse as to whether same are discoverable
1(q)	Documents evidencing any payments made by Debtor on Schedule H debts	Everything responsive they have was produced	Resolved
1(r)	Debtor's A/R and A/P reports	No responsive documents exist	Resolved
1(s)	Debtor's advertising materials	All responsive documents produced (business card and yard sign)	Resolved
1(t)	Financial statements submitted by Debtor to banks	No responsive documents exist	Resolved
1(u)	Pro-forma income and expense statements submitted to banks	No responsive documents exist	Resolved

EXHIBIT “2”

Exhibit “A” Reference	Description	Status	Resolution?
1(a)	Mr. Nash’s Bank Records	Blanket Objection	Open item
1(b)	Mr. Nash’s Tax Returns	Blanket Objection	Open item
1(c)	Documentation of Mr. Nash’s income	Blanket Objection	Open item
1(d)	Financial statements submitted to banks by Mr. Nash	Blanket Objection	Open item
1(e)	Pro-forma income/expense statements submitted to Banks by Mr. Nash	Blanket Objection	Open item

EXHIBIT “3”

Exhibit “A” Reference	Description	Status	Resolution?
1(a)	Documents which identify Terra’s insiders	Blanket Objection	Open item
1(b)	LLC formation documents	Blanket Objection	Open item
1(c)	LLC governance documents	Blanket Objection	Open item
1(d)	Terra’s meeting minutes	Blanket Objection	Open item
1(e)	Documentation of Terra’s assets	Blanket Objection	Open item
1(f)	Bank records	Blanket Objection	Open item
1(g)	Credit card statements	Blanket Objection	Open item
1(h)	Contracts/invoices/etc.	Blanket Objection	Open item
1(i)	Tax Returns	Blanket Objection	Open item
1(j)	Terra’s financial statements	Blanket Objection	Open item
1(k)	Terra’s payroll records	Blanket Objection	Open item
1(l)	Docs identifying subcontractors	Blanket Objection	Open item
1(m)	A/R & AP reports	Blanket Objection	Open item
1(n)	Advertising materials	Blanket Objection	Open item
1(o)	Financial statements submitted to a bank	Blanket Objection	Open item
1(p)	Pro-forma income/expense statements submitted to bank	Blanket Objection	Open item